IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

CASE NO.1-09-07161

THREE ARROWS ENTERPRISES, INC. d/b/a BLACK TIE MOTOR CARS

CHAPTER 11

Debtor

AMENDED VERIFICATION OF ANDREW S. GIBBS, PRESIDENT OF A. GIBBS & ASSOCIATES, P. C., PURSUANT TO FED.R.BANKR.P. 2014, IN SUPPORT OF DEBTOR'S APPLICATION TO RETAIN A. GIBBS & ASSOCIATES, P. C

- I, Andrew S. Gibbs, make the following verified statements:
- 1. I am President of A. Gibbs & Associates, P. C. ("Gibbs").
- 2. Gibbs has no connection to any party in the above-referenced Chapter 11 case, including without limitation to the Debtor, its creditors, any other parties in interest, the United States Trustee, or any other person employed in the office of the United State Trustee, or any other party with actual or potential interest in this Chapter 11 case or their respective attorneys, accountants or financial advisors. Pre-petition, Gibbs did not conduct any work for Debtor or on Debtor's behalf, any and all discussions with Debtor and Susquehanna Bank were conducted after filing the Chapter 11 Petition.
- 3. Gibbs is not a creditor of the Debtor. Further, any services which Gibbs would perform with respect to the Debtor concerning locating new financing would strictly be done as a referral only. No broker's commission or finder's fee would be paid to Gibbs on account of securing such financing. All services would be compensated strictly on an hourly basis. Gibbs has no financial interest in the outcome of the case other than to be paid hourly compensation for services performed in connection with work concerning the Debtor, including preparation of financial statements as required, tax returns, redoing books and records, analysis of the Debtor's financial situation, assistance with and preparation of a Plan of Reorganization and possibly obtaining of new financing sources.
- 4. The undersigned is not aware of any conflict or potential conflict relating to the employment of Gibbs to accounting matters in this case.
- 5. I understand that monetary compensation to Gibbs for fees and expenses incurred in this case may be subject to further approval of this Court, after appropriate notice and hearing.
- 6. The factual statements set forth in this Verification have been made based on a personal review by me and our staff to the list of insiders and creditors of Three Arrows Enterprises, Inc. This effort did not reveal any potential conflicts.

I verify, under penalty of perjury under the laws of the Commonwealth of Pennsylvania and the United States of America, that the foregoing is true and correct.

Andrew S. Gibbs

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